



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 8

1595 Wynkoop Street  
Denver, CO 80202-1129  
Phone 800-227-8917  
[www.epa.gov/region08](http://www.epa.gov/region08)

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Ref: 8EPR-N

Scott Fitzwilliams, Forest Supervisor  
White River National Forest  
c/o Sarah Hankens, Rifle District Ranger  
0094 County Road 244  
Rifle, CO 81650

RE: White River National Forest Oil & Gas Leasing Analysis  
Final Environmental Impact Statement, CEQ #20140361

Dear Supervisor Fitzwilliams:

The U.S. Environmental Protection Agency Region 8 has reviewed the U.S. Department of Agriculture Forest Service (USFS) December 2014 Final Environmental Impact Statement (EIS) and draft Record of Decision (ROD) for the White River National Forest (WRNF) Oil and Gas Leasing Analysis. Our comments are provided for your consideration pursuant to our responsibilities and authority under Section 102(2)(C) of the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act (CAA).

### Background

The WRNF spans 2.3 million acres in the central Rocky Mountains of Colorado and includes portions of Eagle, Pitkin, Garfield, Summit, Rio Blanco, Mesa, Gunnison, Routt and Moffat Counties. This proposed decision will revise the last WRNF oil and gas leasing analysis, completed in 1993, by updating the reasonably foreseeable development (RFD) scenario, identifying lands that will be available on the WRNF for oil and gas leasing, and identifying related stipulations, such as No Surface Occupancy (NSO) and Controlled Surface Use (CSU), that will be included on any future leases. Since this is a programmatic analysis, site specific projects are not being considered or approved at this time.

No Preferred Alternative was identified in the Draft EIS, but the No Action alternative and three action alternatives were analyzed. Based on public comments received, the draft ROD proposes to select a combination of Alternatives B (no new leasing) and C (identified 260,308 acres of WRNF lands as available for oil and gas leasing). The draft ROD, if finalized, would provide the following outcomes:

- 194,123 acres would be identified as "Administratively Available for Leasing;"
- 800,555 acres would remain legally "Closed to Oil and Gas Leasing" (via Congressional direction, e.g., designated Wilderness, permitted ski areas, campgrounds/administrative sites);
- 1,281,726 acres would be "Closed for Oil and Gas Leasing Through Management Direction;" and

- Adoption of the stipulation requirements for Administratively Available Lands as written in Appendix A of the Final EIS, which includes an NSO lease stipulation for all designated Roadless areas and numerous NSO and CSU lease stipulations for protection of water resources.

This decision would change the lands administratively available for lease from 411,475 acres to 194,123 acres. We support this draft decision as protective of the WRNF's natural resources.

We have greatly appreciated the USFS's collaborative efforts over the years of development of this EIS. While we support your proposed ROD, we note that if a less protective decision is ultimately selected then some of our previous comments on the water resources and air quality analyses and mitigation measures for this EIS, as reiterated below, would become more important to address.

### **Water Resources**

We appreciate the USFS's considerable effort to protect water resources on the WRNF. As noted in the draft ROD, the Final EIS, Appendix A, includes NSO and CSU lease stipulations that will be applied at the project level to protect water resources, including water influence zones, public water supply source areas, fen wetlands, alpine habitat and groundwater. While some of these lease stipulations are not consistent with the EPA's general recommendations, we understand – based on conversations between our staffs - that a similar level of protection was achieved indirectly through the WRNF's additional lease stipulations to protect other resources such as wildlife habitats. We encourage you to continue this positive trend in protecting the WRNF's valuable water resources.

### **Air Quality**

The analyses presented in the Final EIS, along with the commitment that near-field modeling will be completed at the project level to ensure that appropriate mitigation measures will be applied if air quality impacts are identified at that time, provide a level of assurance that air resources in the region will be protected. However, the Final EIS only provides the air quality impacts for the minimum and maximum development scenarios, rather than for each action alternative, making it difficult to determine what, if any, impacts to the National Ambient Air Quality Standards or air quality related values are associated with the development scenarios between minimum and maximum development. Given the uncertainties with the Final EIS air analyses, it is particularly important to identify potential mitigation measures that may be required at the project level to ensure protection of air resources once project level analyses are completed.

We understand that mitigation measures related to air resource impacts will be analyzed at the project level and, if necessary, would be required pursuant to the Bureau of Land Management (BLM) conditions of approval (COAs) prior to issuance of BLM drilling permits. In addition, we understand that the COAs will draw upon the best management practices and air emission reduction strategies for oil and gas development identified in Colorado BLM's February 2014 Comprehensive Air Resources Protection Protocol (or most recent version). However, due to the inability to identify air impacts between the minimum and maximum development scenarios analyzed in the Final EIS, we continue to recommend that this USFS planning level analysis include a list of the potential mitigation measures that

the USFS believes may be necessary at the project level. For example, based on known air pollution concerns associated with oil and gas development, potential measures may include the following:

- Reduce fugitive dust emissions through use of unpaved surface treatments including water, chemical suppressants, gravel, and speed limit restrictions.
- Reduce surface disturbance, vehicle traffic, and fugitive dust emissions by consolidating facilities (e.g., using multi-well pads, gathering systems, storage vessels).
- Control volatile organic compound (VOC) emissions from glycol dehydrators, condensate tanks and produced water tanks.
- Reduce VOC and methane emissions through use of green completion technology for well completions and recompletions. Venting of natural gas would not be allowed, except during emergency situations.
- Eliminate evaporation pits for drilling fluids to reduce VOC and greenhouse gas emissions.
- Improve engine technology to reduce nitrogen oxides, particulate, carbon monoxide, VOC, and hazardous air pollutant emissions by requiring diesel drill rig engines to meet generator set Tier 4 (or more stringent) emission standards for non-road diesel engines.
- Consider powering compressor stations and other operations with electric motors or electric equipment.
- In coordination with other federal, state and local agencies, expand air quality monitoring efforts within the WRNF, particularly for ozone.

## Closing

We appreciated the opportunity to review these documents. If further explanation of our comments is desired, please contact me at 303-312-6704, or your staff may contact Amy Platt, at 303-312-6449 or [platt.amy@epa.gov](mailto:platt.amy@epa.gov).

Sincerely,



Philip S. Strobel  
Acting Director, NEPA Compliance and Review Program  
Office of Ecosystems Protection and Remediation



